



U.S. Department of Justice

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January 8, 2026

VIA ECF AND EMAIL

The Honorable Lydia K. Griggsby
United States District Court for the District of Maryland
6500 Cherrywood Lane, Suite 400
Greenbelt, Maryland 20770

Re: Government's Status Report - *United States v. Thomas Goldstein*
Crim. No. LKG-25-006

Dear Judge Griggsby:

The government is prepared to argue the motions identified in the Court's Scheduling Order (ECF NO. 320) at the pretrial conference on Friday, January 9, 2026. However, the government writes to advise the Court of the additional items it anticipates raising during the pretrial conference, including:

1. The now ripe Government's Motion *in Limine* to Admit Certain of Goldstein's Statements to the *New York Times* (Government's Exhibit 5) (ECF Nos. 327);
2. *Frye/Lafler* hearing;
3. Jury nullification argument (ECF No. 204 revisited);
4. Time allotment of opening and closing statement;
5. Voir dire questions and process;
6. Rule 615 on sequestration of witnesses;
7. Government will ask for a date certain for statute of limitation purposes; and
8. Trial schedule (hours, any days off, and date of government's first witness).

Of course, the government will be happy to address any other items on the Court's agenda. Please do not hesitate to contact us with any questions or concerns.

Respectfully submitted,

Kelly O. Hayes
United States Attorney

By: /s/
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